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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JENNETTE LYNN STANCY,)	Case No.: 2:23-cv-00604-TLN-DMC
Plaintiff,)	STIPULATION AND ORDER FOR AN
)	EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended 29 days from October 11, 2023, up to and including November 9, 2023. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly. This is the Defendant's second request for an extension of the responsive brief deadline.

There is good cause for this extension. Defendant requires additional time to complete review of this case's defensibility and fully investigate the possibility of settlement. For the past several months, Defendant's undersigned counsel has had an unusually high workload consisting, in part, of approximately ten to twelve briefs due each month. Defendant's

undersigned counsel has three briefs due next week alone, including in this case. Given these circumstances, Defendant has not been able to complete her review of this case. Additional time would provide Defendant an opportunity to complete her review of this case, Plaintiff an opportunity to consider any remand offer, the parties to negotiate the terms of any remand offer, and Defendant time to prepare her response if the parties cannot agree to a voluntary remand.

For these reasons, Defendant respectfully requests an extension of 29 days, until November 9, 2023, to file her response. This request is made in good faith and is not intended to unduly delay the proceedings in this matter.

Respectfully submitted,

Dated: October 3, 2023

/s/ Melissa Markos Nyman*
(*as authorized via e-mail)
MELISSA MARKOS NYMAN
Attorney for Plaintiff

Dated: October 3, 2023

PHILLIP A. TALBERT
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By: /s/ Sohayl Vafai
SOHAYL VAFAI
Special Assistant U.S. Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including November 9, 2023, to respond to Plaintiff's Motion for Summary Judgment.

Dated: October 3, 2023


DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE